## **REMARKS/ARGUMENTS**

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-7 are currently pending in this application. By this Amendment, Applicants amended Claims 1, 3-5 and 7.

In the Outstanding Office Action, Claims 1-7 were rejected under 35 U.S.C. §112, second paragraph, as indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention, and Claims 1-7 were rejected under 35 U.S.C. §103(a) as unpatentable over <u>Buxton et al.</u> (U.S. Patent No. 6,469,714, hereinafter <u>Buxton</u>) in view of <u>Halliday el al.</u> (U.S. Patent No. 5,880,740, hereinafter <u>Halliday</u>).

In response to the rejection of Claims 1-7 under 35 U.S.C. §112, Claim 1 is amended, without adding new matter, to address the deficiency identified in the outstanding Office Action. Accordingly, the rejection of the claims is believed to have been overcome.

In particular, in regard to Claim 1, the Office Action states that the elements "exporting said bitmapped image to the memory of said monitor unit for immediate reproduction of said visual information on said display" and "said conversion means storing said bitmapped image for each said rectangular frame in said memory" appear contradictory. The last two paragraphs of Claim 1 are amended to now more clearly recite "said image design tool having means for drawing, on said first display, a plurality of rectangular frames to be included in said visual information, each rectangular frame being written in said source display code which is translated by said conversion means into said bitmapped image which is exported to said memory in said monitor unit."

Therefore, Applicants respectfully submit that amended Claim 1, and its dependent Claims 2-7, comply with the requirements of 35 U.S.C. §112.

<sup>&</sup>lt;sup>1</sup> Office Action of June 9, 2004, page 2.

Briefly, in a non-limiting embodiment, a system made possible by the present invention for designing visual information stores individual information, such as "please select," "continuous operation" and "stop," in separate rectangular frames, to convert the information into bitmapped images and to store the bitmapped images in the memory of the monitor unit. In this manner, a single display area is divided into a plurality of rectangular frames with each frame including visual information that is converted into the corresponding bitmapped image to be stored in the memory of the monitor unit. Thus, the monitor unit can make immediate reproduction of bitmapped image at high speed without requiring costly components to translate the source image code into the bitmapped image.

In another non-limiting embodiment, the source display code and the bitmapped image for each page are separately transferred to the memory. The source display code and the switch control code for each page can be retrieved separately from the memory. This allows for easy modification of the source display code and the switch control code.

Turning now to the obviousness rejection of Claim 1, Applicants respectfully submit that amended Claim 1 patentably distinguishes over <u>Buxton</u> in view of <u>Halliday</u>.

Claim 1 is amended to clarify that the monitor unit is separate from the computer.

Amended Claim 1 recites "an image design tool operating on a personal computer equipped with a first display;" "said monitor unit including a second display which is different from said first display;" and "said second display giving thereon task information to be performed by the device managed by the PLC, and including a touch screen for entry of a specific instruction to be carried out by the PLC for control of said device." Indeed, <u>Buxton</u> does not disclose that the monitor unit is separate from the computer. On the contrary, Fig. 1 of <u>Buxton</u> shows video display 170 being part of the computer.

Amended Claim 1 also recites "...said image design tool creating a source display code for displaying said visual information on said second display...." <u>Buxton</u> does not disclose

the image design tool creating a source display code. The Office Action cites to Col. 4 lines 40-44 as disclosing the quoted element.<sup>2</sup> However, <u>Buxton</u> only discloses that the InfoCenter GUI is implemented using Java.<sup>3</sup> The InfoCenter of <u>Buxton</u> does not create source display code. <u>Buxton</u> describes the InfoCenter as a data consumer and an applet as a data producer.<sup>4</sup> <u>Buxton</u> discloses that applet designers create UI panels using a visual interface builder such as Bogo.<sup>5</sup> Fig. 2 of <u>Buxton</u> shows that the InfoCenter and the applet are separate structures. Therefore, Buxton does not disclose the image design tool creating source display code.

The Office Action also recognizes that <u>Buxton</u> does not disclose translating the source display code into a corresponding bitmapped image, and <u>Halliday</u> is cited to prove that teaching.<sup>6</sup> Applicants respectfully submit that <u>Halliday</u> does not disclose that the image design tool has "means for drawing, on the first display, a plurality of rectangular frames to be include in the visual information, each rectangular frame being written in the source display code which is translated by the conversion means into the bitmapped image which is exported to said memory in said monitor unit," as recited in Claim 1. This element is not disclosed nor suggested in any of the cited references.

On the contrary, <u>Halliday</u> discloses a positional input device that translates a user's selection into a common message format typically called a mouse event.<sup>7</sup> The common message format is not disclosed as being a bitmap file. The mouse event stores the coordinates of the mouse cursor.<sup>8</sup> The Abstract of <u>Halliday</u> does not disclose "the source display code which is translated by the conversion means into the bitmapped image" and that

<sup>&</sup>lt;sup>2</sup> Office Action of June 9, 2004, page 3.

<sup>&</sup>lt;sup>3</sup> Buxton, col. 4, lines 40-43.

<sup>&</sup>lt;sup>4</sup> Buxton, col. 15, lines 33-34.

<sup>&</sup>lt;sup>5</sup> Buxton, col 16, lines 20-21.

<sup>&</sup>lt;sup>6</sup> Office Action of June 9, 2004, page 3.

<sup>&</sup>lt;sup>7</sup> Halliday, col. 4, lines 6-10.

<sup>&</sup>lt;sup>8</sup> Halliday, col. 4, lines 28-30.

the image design tool is "provided with a conversion means for translating...." Halliday only discloses that a composite image may be converted into a bitmap file.<sup>9</sup>

In view of the above indicated distinctions, Applicants respectfully submit that Claim 1 (and its dependent Claims 2-7) patentably distinguish over <u>Buxton</u> in view of <u>Halliday</u>.

Turning now to the rejection of Claim 3, applicants respectfully submit that dependent Claim 3 even further patentably distinguishes over <u>Buxton</u> in view of <u>Halliday</u>. Claim 3 recites "said image design tool transferring, to said memory, the source display code and the bitmapped image with regard to individual visual information to be displayed on plural pages of said second display, and said retrieving means retrieving, from the memory, the source display code and the switch control code with regard to each of said pages." The Office Action cites <u>Buxton</u> at Col. 17 line 22 as disclosing the above quoted element of amended Claim 3.<sup>10</sup>

However, <u>Buxton</u> only discloses setSelection() and getSelection() methods used to manage the Selection interface. Buxton disclose that the setSelection method is called by the InfoCenter to provide the selection object to the Commander. The selection object provides the hook the Commander needs to the Applet. Therefore, <u>Buxton</u> does not disclose setSelection as "transferring, to said memory, the source display code and the bitmapped image..."

<u>Buxton</u> discloses that the getSelection retrieves the last Selection interface received by call to setSelection.<sup>14</sup> Thus, getSelection retrives a selection object. Therefore, <u>Buxton</u> does not disclose the getSelection as retrieving, "from the memory, the source display code and the switch control code with regard to each of said pages."

<sup>&</sup>lt;sup>9</sup> Halliday, Abstract, lines 14-15.

<sup>&</sup>lt;sup>10</sup> Office Action of June 9, 2004, page 4.

<sup>11</sup> Buxton, Col. 17, lines 22-24.

<sup>&</sup>lt;sup>12</sup> Buxton, Col. 23, lines 64-66.

<sup>&</sup>lt;sup>13</sup> Buxton, Col. 23, lines 66-67.

<sup>&</sup>lt;sup>14</sup> Buxton, Col. 24, lines 12-14.

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In view of the above noted distinctions, Applicants respectfully submit that Claim 3 further patentably distinguishes over <u>Buxton</u> in view of <u>Halliday</u>.

Consequently, in view of the above amendments and comments, it is respectfully submitted that the outstanding rejection is overcome and the pending claims are in condition for allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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